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September 13, 2021

VIA ECF

Hon. Alison J. Nathan
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: P.W. o/b/o B.W. v. Dep't of Educ. 21-cv-4805 (AJN)

Dear Judge Nathan:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, Georgia M. Pestana, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.*, as well as for this action.


I write to request a 90-day stay of this case, including a stay of the deadline by which Defendant must file its answer. Plaintiff consents to these requests, and has agreed to provide billing records for this matter by September 14, 2021. This is the third request for an extension of the time to answer and the first request for a stay. Defendant's previous requests for extensions were made on June 15, 2021 (granted June 15, 2021) and August 24, 2021 (granted August 25, 2021).

The requested extension would provide Defendant with sufficient time to review the billing records (once provided) with the administrative record, and obtain settlement authority from the New York City Office of the Comptroller. We are hopeful that the parties will settle this matter without the need for further burden on the Court's time.

Accordingly, Defendant respectfully requests that the action be stayed for 90 days.

Thank you for considering these requests.

SO ORDERED.



SO ORDERED.
ALISON J. NATHAN, U.S.D.J.

9/13/21

cc: Irina R

ully submitted,

Nicholson

Assistant Corporation Counsel